

**REMARKS**

Claims 1 - 20 are now pending in this Application. The Non-Final Office Action (OA) dated March 22, 2006 has rejected Claims 1 - 20. No claims have been amended, added, or canceled. Applicants submit that the pending claims are patentable for the reasons discussed in detail below.

**Rejections under 35 U.S.C. §103(a):** Claims 1-4, 7-9, 10, 15-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Adrangi et al. (U.S. Patent Application Publication No. 2004/0120328, hereinafter referred to as Adrangi) in view of Liu et al. (U.S. Patent Application Publication No. 2004/0120295 A1, hereinafter referred to as Liu ‘295).

Neither Adrangi nor Liu ‘295, alone or in combination, teaches or suggests “the HA is configured to provide a signaling and tunneling functionality and to notify the PHA of the mobile node,” as recited by Claim 1. The Office Action admits that Adrangi does not disclose this limitation. Instead, according to the Office Action, the combination of Adrangi with Liu ‘295 makes Claim 1 obvious. The Office Action states that the MIP proxy 102 of Liu ‘295 acts as Claim 1’s home agent (HA) and the home agent 112 of Liu ‘295 acts as Claim 1’s proxy home agent (PHA). The Office Action states that the MIP proxy 102 (HA) performs the action of “sending a registration request, which is a notification of the mobile node 102, on behalf of the mobile node 120 to the home agent 112” (PHA). Office Action, p. 7, para. 1. The Office Action equates the “registration request” with Claim 1’s limitation of notification of “the PHA of the mobile node.”

Applicants respectfully disagree. Liu ‘295 does not disclose “sending a registration request, which is a notification of the mobile node 102, on behalf of the mobile node 120 to the home agent 112,” as the Office Action suggest. At most, Liu ‘295 discloses “the MIP proxy 102 sends a registration request on behalf of the mobile node 120 that specifies the MIP proxy as the care-of address for the mobile node 120,” but Liu ‘295 does not disclose that this registration request is sent to the home agent 112 (PHA). Liu ‘295, p. 3. para. 33.

Moreover, Liu '295 does disclose that "[a]fter receiving the registration request, the home agent 112 binds the MIP proxy address as the care-of address of the mobile node 120." Liu '295, p. 3. para. 34. However, Liu '295 does not state that this "registration request" is from the MIP proxy 102 (HA). Liu '295 mentions at least two "registration request" (e.g. from mobile node 120 and from MIP proxy 102). Because it is unclear which "registration request" is referred to, the Office Action cannot pick and choose disconnected references in Liu '295 to make obvious Claim 1.

Additionally, Liu '295 does disclose that "[a]fter receiving the registration request from MIP proxy 102, home agent 114 binds the MIP proxy address as the care-of address for VPN gateway 104." Liu '295, p. 3. para. 34. However, while this statement may arguably disclose "the HA is configured ... to notify the PHA," it does not teach that the PHA is notified "of the mobile node." The VPN gateway 104 is a completely different component than mobile node 120. Therefore, nothing in Liu '295 teaches or suggests "the HA is configured to provide a signaling and tunneling functionality and to notify the PHA of the mobile node." At least for this reason, Adrangi in view of Liu '295 does not make obvious Claim 1.

Independent Claims 15 and 19, recite similar, albeit different limitations as Claim 1. Therefore, Claims 15 and 19 should be allowable for substantially similar reasons.

Claims 2-14, 16-18 depend on Claims 1 and 15 respectively and should be allowable for similar reasons.

Rejections under 35 U.S.C. §103(a) over Adrangi & Liu '900: Claims 5, 9, and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Adrangi in view of Liu '295 and in further view of Liu et al. (U.S. Patent Application Publication No. 2004/0212900 A1 hereinafter referred to as Liu '900). However, Claims 5, 9, and 14 ultimately depend from independent Claim 1, so are allowable for at least the same reasons as independent Claim 1.

Rejections under 35 U.S.C. §103(a) over Adrangi, Liu '295, Liu '900, & Mikkonen: Claims 6, and 11-13 are rejected under 35 U.S.C. §103(a) as being unpatentable over Adrangi in

## CONCLUSION

Respectfully submitted,

By Thomas M. Marquis  
Thomas R. Marquis  
Registration No.: 46900  
DARBY & DARBY P.C.  
P.O. Box 5257  
New York, New York 10150-5257  
(206) 262-8900  
(212) 527-7701 (Fax)  
Attorneys/Agents For Applicant